

**IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA**

JOE ALEXANDER WRIGHT,

Plaintiff,

v.

Civil Action No. 22A01246

B.W. MITCHUM TRUCKING COMPANY, INC.;  
NATIONAL CASUALTY COMPANY;  
MIT LEASING LLC;  
JASON DAMIEN GUEST;  
JOHN DOE;  
ABC CORP AND XYZ CORP.

Defendants.

**COMPLAINT AND DEMAND FOR JURY TRIAL**

1. This is a personal injury action arising from a motor vehicle collision on April 28, 2020, wherein Plaintiff Joe Alexander Wright sustained serious injuries when his vehicle was struck by the Defendant's 2016 Freightliner truck being driven by Jason Damien Guest who was operating the truck in the scope of his employment.
2. The collision occurred in Dekalb County Georgia on Interstate 285 East.
3. This action is being timely filed on or about April 3, 2022.
4. The statute of limitations applicable to this matter was tolled for a period of time until the Defendant resolved the underlying criminal traffic offense in Dekalb County.
5. Additionally, the statute of limitations applicable to this matter was tolled by Order of the Supreme Court of Georgia originally issued on March 14, 2020, and subsequently extended through July 14, 2020.

**PARTIES AND JURISDICTION**

6. Plaintiff is a resident of the State of Georgia. Plaintiff submits to the jurisdiction and venue of this Court.
7. Defendant B.W. Mitchum Trucking Company Inc., is a foreign company incorporated in Virginia with its principal place of business at 237 Farmington Road, Summerville, South Carolina, 29483. This court has personal jurisdiction over B.W. Mitchum Trucking Company Inc. because it regularly transacts business and derives profits from business activities in Georgia and maintains a registered agent in Georgia, Corporation Service Company, 2 Sun Court, suite 400, Peachtree Corners, Gwinnett County, Georgia, 30092. B.W. Mitchum Trucking Company, Inc. may be served through its registered agent in Georgia, or by any other method prescribed by the Civil Practice Act.
8. B.W. Mitchum Trucking Company, Inc., has been properly served with process in this action.
9. Defendant National Casualty Company is a foreign insurance company with its principal place of business located at 8877 North Gainey Center Drive, Scottsdale, AZ 85258. This court has personal jurisdiction over National Casualty Company because it regularly transacts business and derives profits from business activities in Georgia and maintains a registered agent in Georgia, Corporation Service Company, 2 Sun Court, suite 400, Peachtree Corners, Gwinnett County, Georgia, 30092. National Casualty Company may be served through its registered agent in Georgia, or by any other method prescribed by the Civil Practice Act.
10. Defendant National Casualty Company has been properly served with process in this action.

11. Defendant MIT Leasing, LLC is a foreign limited liability company incorporated in South Carolina with registered agent Ronald B. Cooper located at 549 Long Point Road, Mt. Pleasant, South Carolina, 29464 and may be served through its registered agent or by any other method prescribed by the Civil Practice Act.
12. MIT Leasing LLC, has been properly served with process in this action.
13. Defendant Jason Damien Guest is a resident of the State of South Carolina and may be served at his address, 1122 Peacock Street, Manning, South Carolina, 29102 or in any manner allowable under Georgia law including service via the Georgia Secretary of State pursuant to Georgia's Non-Resident Motorist Act at O.C.G.A. §40-12-2, et. Seq. or Georgia's Long Arm Statute at O.C.G.A. §9-10-91 & O.C.G.A. §9-10-94.
14. Jason Damien Guest has been properly served with process in this action.
15. Defendants ABC Corp. and John Doe are entities or persons that owned, maintained, or are otherwise responsible for the truck tractor and or trailer involved in the subject collision and/ or employed the driver of the truck tractor involved in the subject collision and are subject to the jurisdiction and venue of this Court. Plaintiff incorporates by reference all claims made in this Complaint against any other Defendant against Defendants ABC Corp. and John Doe. Defendants ABC Corp. and John Doe will be named and served with the Summons and Complaint once their identities are revealed.
16. Defendant XYZ Corp. is an entity that insured the truck tractor and or entity that owned the truck tractor involved in the subject collision and is subject to the jurisdiction and venue of this Court. Plaintiff incorporates by reference all claims made in this Complaint against any other Defendant against Defendant XYZ Corp. Defendant XYZ Corp. will be named and served with the Summons and Complaint once their identity is revealed.

17. Venue is proper in Dekalb County pursuant to O.C.G.A. § 14-2-510 as the tortious act and resulting injury occurred in Dekalb County.
18. Venue is proper in Dekalb County pursuant to O.C.G.A. § 40-1-117 as the tortious act and resulting injury occurred in Dekalb County.
19. Diversity jurisdiction is improper in federal district court because complete diversity of citizenship between the parties is lacking.

### **FACTS**

20. On or about April 28, 2020, Plaintiff Joe Alexander Wright was on I-285 East in Dekalb County, Georgia and was in the center lane behind a 2007 Freightliner truck that was being driven by Dennis Richards.
21. On or about April 28, 2020 Plaintiff observed a 2007 Freightliner truck stopping for traffic in the roadway and Plaintiff also stopped.
22. On or about April 28, 2020, Defendant Jason Damien Guest was operating a 2016 Freightliner truck owned by MIT leasing, LLC and or B.W. Mitchum Trucking Company, Inc.
23. Defendant Jason Damien Guest was maneuvering and changing lanes and rear-ended the Plaintiff's vehicle forcing the Plaintiff's vehicle into the truck driven by Dennis Richards.
24. Defendant Jason Damien Guest was driving the 2016 Freightliner truck which was owned by Defendants MIT Leasing, LLC and or B.W. Mitchum Trucking Company, Inc.
25. Defendant Jason Damien Guest was in the scope of employment for B.W. Mitchum Trucking Company, Inc.
26. The 2016 Freightliner truck involved in this collision was insured by National Casualty Company on a policy written for B.W. Mitchum Trucking Company, Inc. and, is named

in this complaint pursuant to O.C.G.A. § 40-2-140 and O.C.G.A. § 40-1-112 as they are an insurer of a motor carrier.

**COUNT ONE**  
**NEGLIGENCE & BODILY INJURY**

27. Defendants are liable to Plaintiffs for negligence.

28. Defendant Jason Damien Guest caused the collision discussed in this Complaint.

29. At the time of said collision, Defendant Guest was negligent and reckless in the following particulars:

- a. In driving his vehicle with a conscious indifference for the safety of person and property;
- b. In failing to keep his vehicle under control at the time and place in question;
- c. In failing to keep a proper lookout for traffic and conditions ahead;
- d. In driving too fast for the conditions present in violation of O.C.G.A. § 40-6-180 which constitutes negligence per se;
- e. In making an improper lane change in violation of O.C.G.A. § 40-6-123 which constitutes negligence per se;
- f. In following too closely in violation of O.C.G.A. § 40-6-49 which constitutes negligence per se;
- g. Other specifications of negligence as may be proven at trial.

**COUNT TWO**  
**VICARIOUS LIABILITY**

30. Defendants B.W. Mitchum Trucking Company, Inc. and MIT Leasing, LLC are liable to Plaintiff for negligence based on vicarious liability.

31. Defendant Guest was acting in the scope of employment when he was operating the 2016 Freightliner truck.
32. Defendant Guest is an employee and or agent for B.W. Mitchum Trucking Company, LLC.
33. Defendant MIT Leasing owned the 2016 Freightliner truck driven by Defendant Guest.
34. Defendant B.W. Mitchum Trucking Company, Inc., owned or leased the 2016 Freightliner truck driven by Defendant Guest.

**COUNT THREE**  
**DIRECT ACTION**

35. Defendant National Casualty Company d/b/a Nationwide insured the 2016 Freightliner driven by Defendant Guest when this collision occurred.
36. O.C.G.A. §40-2-140(4) states, “Any person having a cause of action, whether arising in tort or contract, under this Code section may join in the same cause of action the motor carrier and its insurance carrier.”
37. The 2016 Freightliner truck owned by one or more of the defendant entities, and being operated by Defendant Guest when the collision happened, is a motor carrier under O.C.G.A. §40-2-1(6).
38. National Casualty Company d/b/a Nationwide is properly joined as an insurance carrier pursuant to O.C.G.A. §40-2-140(4).

**DAMAGES**

39. As a direct and proximate result of the collision in question, Plaintiff sustained serious and painful injuries to his body and mind and continues to suffer physically and mentally.

40. Plaintiff Joe Wright claims general damages for all elements of the physical and mental suffering Plaintiff endured, endures, and will endure, as defined by Georgia law. Such general damages should be measured by the enlightened conscience of a fair and impartial jury.
41. Plaintiff Joe Wright claims as special damages past and future medical expenses which have been incurred as a result of the injuries Plaintiff sustained, in such an amount as the jury deems to be reasonable value of those services. The following is a list of these special damages that are known by Plaintiff to date. The names of providers and their respective amounts may be provided by amendments to the Complaint:

Medical Specials:

Provider	Total bills
Ameri Pro EMS	2,264.90
Northside Emergency Assoc.	689.00
Northside Hospital	4,065.00
Northside Radiology	91.00
Resurgens Orthopaedics	23,339.53
MedRisk Services Chiropractic / PT treatments at Resurgens	5,802.73
One Call Medical Procedures at Resurgens	4,480.00
Northwest GA Orthopaedic Surgery	57,061.00
MAK Anesthesia Holdings Surgery charges at NW GA Ortho Sx	3,430.00
<b>TOTAL</b>	<b>101,223.16</b>

\*\* Please Note that Plaintiff continues to receive ongoing medical care and is still not able to work due to his injuries. As such the medical specials and lost wages continue to increase. \*\*

42. Plaintiff Joe Wright claims as special damages past and future lost earnings which have been incurred as a result of the injuries Plaintiff sustained, in such an amount as the jury deems to be reasonable. Plaintiff has missed over one year of work due to the injuries suffered in this collision. Plaintiff earns an annual salary of \$57,000.00 per year.

Plaintiff is claiming lost wages in excess of \$57,000.00 and they continue to accrue.

43. Plaintiff Joe Wright claims damages for future earning capacity in an amount the jury deems to be reasonable.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray that they have a trial on all issues and judgment against Defendants as follows:

- a. That Plaintiff recover the full value of past and future medical expenses and past and future lost wages in an amount to be proven at trial;
- b. That Plaintiff recover for general damages, including mental and physical pain and suffering and emotional distress in an amount to be determined by the enlightened conscience of the jury;
- c. For attorney's fees pursuant to O.C.G.A. § 13-6-11;
- d. That Plaintiff recover such other and further relief as is just and proper;
- e. That all issues be tried before a jury.

Respectfully submitted April 3, 2022

**STARRETT & HARRIS LAW LLC**

/s/ Wesley Starrett

WESLEY STARRETT

Georgia Bar No. 690037



Starrett & Harris Law, LLC  
5000 Austell Powder Springs Rd SW  
Suite 251  
Austell, GA 30106  
(404) 7777- LAW  
[Wesley@InjuryLawPros.com](mailto:Wesley@InjuryLawPros.com)

22A01246

No. \_\_\_\_\_

**STATE COURT OF DEKALB COUNTY  
GEORGIA, DEKALB COUNTY****Date Summons Issued and E-Filed**

4/4/2022

**SUMMONS**\_\_\_\_\_  
/s/ Monica Gay

Deputy Clerk

Deposit Paid \$ \_\_\_\_\_

\_\_\_\_\_  
JOE ALEXANDER WRIGHT\_\_\_\_\_  
Plaintiff's name and address

[ ] JURY

**vs.**B.W. MITCHUM TRUCKING COMPANY, INC.;  
NATIONAL CASUALTY COMPANY;

MIT LEASING LLC;

JASON DAMIEN GUEST; JOHN DOE; ABC CORP; XYZ CORP.

\_\_\_\_\_  
Defendant's name and address**TO THE ABOVE-NAMED DEFENDANT: B.W. MITCHUM TRUCKING COMPANY, INC.**

Registered Agent: Corporation Service Company, 2 Sun Court, suite 400, Peachtree Corners, GA, 30092

You are hereby summoned and required to file with the Clerk of State Court, Suite 230, 2<sup>nd</sup> Floor, Administrative Tower, DeKalb County Courthouse, 556 N. McDonough Street, Decatur, Georgia 30030 and serve upon the plaintiff's attorney, to wit:

WESLEY STARRETT

Name

5000 AUSTELL POWDER SPRINGS RD, SW, SUTIE 251, AUSTELL, GA 30106

Address

404-777-7529690037

Phone Number

Georgia Bar No.

an **ANSWER** to the complaint which is herewith served upon you, within thirty (30) days after service upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. The answer or other responsive pleading can be filed via electronic filing through eFileGA via [www.eFileGA.com](http://www.eFileGA.com) or, if desired, at the e-filing public access terminal in the Clerk's Office at 556 N. McDonough Street, Decatur, Georgia 30030

\_\_\_\_\_  
Defendant's Attorney\_\_\_\_\_  
Third Party Attorney\_\_\_\_\_  
Address\_\_\_\_\_  
Address\_\_\_\_\_  
Phone No.\_\_\_\_\_  
Georgia Bar No.\_\_\_\_\_  
Phone No.\_\_\_\_\_  
Georgia Bar No.**TYPE OF SUIT**

- ☒ Personal Injury ☐ Products Liability  
☐ Contract ☐ Medical Malpractice  
☐ Legal Malpractice ☐ Product Liability  
☐ Other

Principal \$ \_\_\_\_\_

Interest \$ \_\_\_\_\_

Atty Fees \$ \_\_\_\_\_

**Access to the e-filing site and the rules is available at [www.dekalbstatecourt.net](http://www.dekalbstatecourt.net)****To indicate consent to e-service check the box below.**

☐ (Plaintiff consents to e-service pursuant to OCGA 9-11-5 (f). The email address for service appears in the complaint.

E-file summons1-2016

**STATE COURT OF  
DEKALB COUNTY, GA.  
4/3/2022 1:42 PM  
E-FILED  
BY: Monica Gay**

22A01246

No. \_\_\_\_\_

**STATE COURT OF DEKALB COUNTY  
GEORGIA, DEKALB COUNTY****Date Summons Issued and E-Filed**

4/4/2022

**SUMMONS**\_\_\_\_\_  
/s/ Monica Gay

Deputy Clerk

Deposit Paid \$ \_\_\_\_\_

\_\_\_\_\_  
JOE ALEXANDER WRIGHT\_\_\_\_\_  
Plaintiff's name and address**[ ] JURY****vs.**B.W. MITCHUM TRUCKING COMPANY, INC.;  
NATIONAL CASUALTY COMPANY;\_\_\_\_\_  
MIT LEASING LLC;

JASON DAMIEN GUEST; JOHN DOE; ABC CORP; XYZ CORP.

\_\_\_\_\_  
Defendant's name and address**TO THE ABOVE-NAMED DEFENDANT: JASON DAMIEN GUEST**

1122 Peacock Street, Manning, South Carolina, 29102

You are hereby summoned and required to file with the Clerk of State Court, Suite 230, 2<sup>nd</sup> Floor, Administrative Tower, DeKalb County Courthouse, 556 N. McDonough Street, Decatur, Georgia 30030 and serve upon the plaintiff's attorney, to wit:

WESLEY STARRETT

Name

5000 AUSTELL POWDER SPRINGS RD, SW, SUTIE 251, AUSTELL, GA 30106

Address

404-777-7529

690037

Phone Number

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\_\_\_\_\_  
Defendant's Attorney\_\_\_\_\_  
Third Party Attorney\_\_\_\_\_  
Address\_\_\_\_\_  
Address\_\_\_\_\_  
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Deputy Clerk

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[ ] JURY

**vs.**B.W. MITCHUM TRUCKING COMPANY, INC.;  
NATIONAL CASUALTY COMPANY;

MIT LEASING LLC;

JASON DAMIEN GUEST; JOHN DOE; ABC CORP; XYZ CORP.

\_\_\_\_\_  
Defendant's name and address**TO THE ABOVE-NAMED DEFENDANT: MIT LEASING LLC**

Registered Agent Ronald B. Cooper: 549 Long Point Road, Mt Pleasant, South Carolina, 29464

You are hereby summoned and required to file with the Clerk of State Court, Suite 230, 2<sup>nd</sup> Floor,  
Administrative Tower, DeKalb County Courthouse, 556 N. McDonough Street, Decatur, Georgia  
30030 and serve upon the plaintiff's attorney, to wit:WESLEY STARRETT

Name

5000 AUSTELL POWDER SPRINGS RD, SW, SUTIE 251, AUSTELL, GA 30106

Address

404-777-7529

690037

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NATIONAL CASUALTY COMPANY;MIT LEASING LLC;JASON DAMIEN GUEST; JOHN DOE; ABC CORP; XYZ CORP.Defendant's name and address**TO THE ABOVE-NAMED DEFENDANT: NATIONAL CASUALTY COMPANY****Registered Agent: Corporation Service Company, 2 Sun Court, suite 400, Peachtree Corners, GA, 30092**

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WESLEY STARRETT

Name

5000 AUSTELL POWDER SPRINGS RD, SW, SUTIE 251, AUSTELL, GA 30106

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Defendant's AttorneyThird Party AttorneyAddressAddressPhone No.Georgia Bar No.Phone No.Georgia Bar No.**TYPE OF SUIT**

- ☒ Personal Injury ☐ Products Liability  
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☐ Legal Malpractice ☐ Product Liability  
☐ Other

Principal \$                     Interest \$                     Atty Fees \$                     **Access to the e-filing site and the rules is available at [www.dekalbstatecourt.net](http://www.dekalbstatecourt.net)****To indicate consent to e-service check the box below.**

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STATE COURT OF  
DEKALB COUNTY, GA.  
4/3/2022 1:42 PM  
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BY: Monica Gay

**General Civil and Domestic Relations Case Filing Information Form**☐ Superior or ☒ State Court of Dekalb County

For Clerk Use Only

4/4/2022

22A01246

Date Filed \_\_\_\_\_

Case Number \_\_\_\_\_

MM-DD-YYYY

**Plaintiff(s)**

Wright, Joe A.

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney Wesley Starrett**Defendant(s)**

B.W. MITCHUM TRUCKING COMPANY, INC

NATIONAL CASUALTY COMPANY

MIT LEASING LLC

JASON DAMIEN GUEST

Last	First	Middle I.	Suffix	Prefix
JOHN DOE;	ABC CORP AND XYZ CORP.			

Bar Number 690037 Self-Represented ☐**Check One Case Type in One Box****General Civil Cases**

- ☒ Automobile Tort
- ☐ Civil Appeal
- ☐ Contract
- ☐ Garnishment
- ☐ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

**Domestic Relations Cases**

- ☐ Adoption
- ☐ Dissolution/Divorce/Separate Maintenance
- ☐ Family Violence Petition
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Other Domestic Relations

**Post-Judgment – Check One Case Type**

- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Modification
- ☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number \_\_\_\_\_

Case Number \_\_\_\_\_

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. \_\_\_\_\_  
Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

Version 1.1.18

STATE COURT OF  
DEKALB COUNTY, GA.  
4/3/2022 1:42 PM  
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BY: Monica Gay

## General Civil and Domestic Relations Case Filing Instructions

1. Provide the class of court and county in which the case is being filed.
2. Provide the plaintiff's and defendant's names.
3. Provide the plaintiff's attorney's name and Bar number. If you are representing yourself, provide your own name and check the self-represented box.
4. Provide the type of case by checking only *one* appropriate box. Cases can be either general civil or domestic relations and only *one* type of case within those categories. Check the case type that most accurately describes the primary case. If you are making more than one type of claim, check the case type that involves the largest amount of damages or the one you consider most important. See below for definitions of each case type.
5. Provide the type of post-judgment action, if applicable, by checking the appropriate box. Post-judgment cases are those that seek to enforce or modify an existing judgment. If the case is a post-judgment matter, an initial case type in the general civil and domestic relations boxes must be checked.
6. Provide an answer to the four questions by checking the appropriate boxes and/or filling in the appropriate lines.

### Case Type Definitions

#### General Civil Cases

**Automobile Tort:** Any tort case involving personal injury, property damage, or wrongful death resulting from alleged negligent operation of a motor vehicle.

**Civil Appeal:** Any case disputing the finding of a limited jurisdiction trial court, department, or administrative agency.

**Contract:** Any case involving a dispute over an agreement between two or more parties.

**Garnishment:** Any case where, after a monetary judgment, a third party who has money or other property belonging to the defendant is required to turn over such money or property to the court.

**General Tort:** Any tort case that is not defined or is not attributable to one of the other torts.

**Habeas Corpus:** Any case designed to test the legality of the detention or imprisonment of an individual, not the question of guilt or innocence.

**Injunction/Mandamus/Other Writ:** Cases involving a written court order directed to a specific person, requiring that person to perform or refrain from performing a specific act.

**Landlord/Tenant:** Any case involving landlord/tenant disputes wherein the landlord removes a tenant and his/her property from the premises or places a lien on tenant property to repay debt.

**Medical Malpractice Tort:** Any tort case that alleges misconduct or negligence by a person in the medical profession acting in a professional capacity, such as doctors, nurses, physician's assistants, dentists, etc.

**Product Liability Tort:** Any tort case that alleges injury is caused to a person by the manufacturer or seller of an article due to a defect in, or the condition of, the article sold or an alleged breach of duty to provide suitable instructions to prevent injury.

**Real Property:** Any case involving disputes over the ownership, use, boundaries, or value of fixed land.

**Please note:** This form is for statistical purposes only. It shall have no legal effect in the case. The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or court rules. Information on this form cannot be entered into evidence.

**Restraining Petition:** Any petition for a restraining order that does not result from a domestic altercation or is not between parties considered to be in a domestic relationship.

**Other General Civil:** Any case in which a plaintiff requests the enforcement or protection of a right or the redress or prevention of a wrong, but does not fit into one of the other defined case categories.

#### Domestic Relations Cases

**Adoption:** Cases involving a request for the establishment of a new, permanent relationship of parent and child between persons not so biologically related.

**Dissolution/Divorce/Separate Maintenance:** Any case involving the dissolution of a marriage or the establishment of alimony or separate maintenance.

**Family Violence Petition:** Any case in which a protective order from a family member or domestic partner is requested.

**Paternity/Legitimation:** Cases involving the establishment of the identity and/or responsibilities of the father of a minor child or the determination of biological offspring.

**Support – IV-D:** Cases filed by the Georgia Department of Human Services to request maintenance of a minor child by a person who is required, under Title IV-D of the Social Security Act of 1973, to provide such maintenance.

**Support – Private (non-IV-D):** Cases filed to request maintenance of a parent/guardian or a minor child by a person who is required by law, but who is not under the auspices of Title IV-D of the Social Security Act of 1973, to provide such maintenance.

**Other Domestic Relations:** Domestic relations cases, including name changes, that do not adequately fit into any of the other case types.

#### Post-Judgment

**Contempt:** Any case alleging failure to comply with a previously existing court order.

**Modification:** Any case seeking to change the terms of a previously existing court order.

**Other/Administrative:** Any case with post-judgment activity that does not fit into contempt or modification categories.

IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

JOE ALEXANDER WRIGHT,

Plaintiff,

v.

B.W. MITCHUM TRUCKING COMPANY, INC.;  
NATIONAL CASUALTY COMPANY;  
MIT LEASING LLC;  
JASON DAMIEN GUEST;  
JOHN DOE;  
ABC CORP AND XYZ CORP.

Defendants.

Civil Action No. 22A01246

**RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY**

This is to certify that pursuant to Uniform State and Superior Court Rule 5.2, I have served counsel of record or Defendant with copies of the **PLAINTIFF'S FIRST INTERROGATORIES, REQUESTS TO PRODUCE, AND ADMISSIONS TO DEFENDANT B.W. MITCHUM TRUCKING COMPANY**, by personal service along with the Complaint and Summons.

**PERSONS SERVED:**

Registered Agent: Corporation Service Company  
2 Sun Court, suite 400  
Peachtree Corners, Gwinnett County, Georgia, 30092

Respectfully submitted April 3, 2022

**STARRETT & HARRIS LAW LLC**

/s/ Wesley Starrett  
WESLEY STARRETT  
Georgia Bar No. 690037

Starrett & Harris Law, LLC  
5000 Austell Powder Springs Rd SW  
Suite 251  
Austell, GA 30106  
(404) 7777- LAW  
[Wesley@InjuryLawPros.com](mailto:Wesley@InjuryLawPros.com)



IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

JOE ALEXANDER WRIGHT,

Plaintiff,

v.

Civil Action No. 22A01246

B.W. MITCHUM TRUCKING COMPANY, INC.;  
NATIONAL CASUALTY COMPANY;  
MIT LEASING LLC;  
JASON DAMIEN GUEST;  
JOHN DOE;  
ABC CORP AND XYZ CORP.

Defendants.

**RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY**

This is to certify that pursuant to Uniform State and Superior Court Rule 5.2, I have served counsel of record or Defendant with copies of the **PLAINTIFF'S FIRST INTERROGATORIES, REQUESTS TO PRODUCE, AND ADMISSIONS TO DEFENDANT JASON DAMIEN GUEST**, by personal service along with the Complaint and Summons.

**PERSONS SERVED:**

Jason Damien Guest  
1122 Peacock Street  
Manning, South Carolina, 29102

Respectfully submitted April 3, 2022

**STARRETT & HARRIS LAW LLC**

/s/ Wesley Starrett  
WESLEY STARRETT  
Georgia Bar No. 690037

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